## **Exhibit 6E - City Letter to Sheet Metal Dated July 21**

Founded in 1852 by Sidney Davy Miller MILLER CANFIELD

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BRIAN M. SCHWARTZ TEL (313) 496-7551 FAX (313) 496-8451 E-MAIL schwartzb@millercanfield.com Miller, Canfield, Paddock and Stone, P.L.C. 150 West Jefferson, Suite 2500 Detroit, Michigan 48226 TEL (313) 963-6420 FAX (313) 496-7500 www.millercanfield.com

July 21, 2020

## SENT VIA CERTIFIED MAIL AND EMAIL

Tim Mulligan Business Manager IBEW Local Union #58 17100 W. Twelve Mile Road Southfield, MI 48076-2115 tmulligan@smw80.org

RE: Request for Information - Sheet Metal Workers' Local Union No. 80 and

City of Detroit

Dear Mr. Mulligan:

On or about March 31, 2020, the City of Detroit ("City") received a Notice of Assessment of Employer Withdrawal Liability ("Notice") Sheet Metal Workers' Local Union No. 80 Pension Trust Fund (the "Fund"), dated March 25, 2020. The City has requested documents from the Fund that purport to establish that it has any obligation to contribute to the Fund, including copies of any collective bargaining agreement which allegedly obligates the City to contribute to the Fund. To date, the Fund has not been provided any such documents. Accordingly, I am requesting that the Sheet Metal Workers' Local Union No. 80 provide copies of any collective bargaining agreements with the City of Detroit covering the time period of January 1, 2006 to the present. The information requested will assist the City in determining its potential obligations toward Sheet Metal Workers' Local Union No. 80's current and former members. Electronic copies are preferable, or I can arrange for hard copies to be picked up.

Thank you very much for your prompt attention. If you have any questions, please do not hesitate to contact me at <a href="mailto:schwartzb@millercanfield.com">schwartzb@millercanfield.com</a> or on my cell phone at 248-930-6088.

## MILLER, CANFIELD, PADDOCK AND STONE, P.L.C.

-2-

July 21, 2020

Very truly yours,

Miller, Canfield, Paddock and Stone, P.L.C.

By

Brian M. Schwartz

cc: Joseph W. Uhl (juhl@wpcplaw.com)

Charles Raimi (raimic@detroitmi.gov)

Marc N. Swanson (<a href="mailto:swansonm@millercanfield.com">swansonm@millercanfield.com</a>)
Samantha A. Kopacz (<a href="mailto:kopacz@millercanfield.com">kopacz@millercanfield.com</a>)

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